

**REMARKS**

Claims 1-6 remain in the application. All claims stand rejected over prior art.

Reconsideration of the application and allowance of all claims are respectfully requested in view of the following remarks.

The present invention is directed to an improved protection arrangement for a WDM transmission network, whereby a resource management or information model uses groups of protection resources associated with a specific flow direction. A key feature of claim 1 is the use of an organization or information model made up of protection groups comprising protection resources a sending or receiving direction.

Tomic does indeed discuss the use of a management information model which supports configuration of protection connections. The protection/redundant resources are discussed in section 2.5 at page 151, but there is no discussion there of direction-specific protection resources. In Section 3.1.2 there is a discussion of unidirectional termination points and the need to administer them as bi-directional entities. There is no discussion of protection groups, although this would suggest bi-directional treatment of protection resources, if anything. Protection groups are discussed in Section 3.3, but again there is no discussion of directional issues, and certainly no discussion of direction-specific protection resources. Fig. 6 illustrates the protection group and protection units as being defined in accordance with the known ITU-T standard G.774.03, which similarly does not require direction-specific protection resources.

Thus, Tomic is silent as to the central point of the invention of claim 1, and if anything would appear to teach away from the invention, and certainly cannot be considered to anticipate claim 1. Claim 6 recites similar features, and distinguishes over Tomic for the same reason.

As to claims 2-5 and the additional reliance on Hwang, the examiner has cited paragraphs [0012]-[0016] and [0065]-[0067] as being relevant to the feature of dedicated unidirectional protection groups. However, while paragraphs [0012]-[0016] do discuss unidirectional optical modules and unidirectional optical cross-connects, there is no discussion whatsoever about protection groups. The present inventors do not claim to have invented the concept of unidirectionality in a WDM system. But what they have invented is the use of protection resources which can be deployed on a direction-specific basis to achieve improved functionality, as described in detail in the present application. None of the art even touches on this critical concept of the invention.

All of the above comments were made to the examiner in the Request For Reconsideration filed January 13, 2006, and the examiner responded to such arguments in the Advisory Action mailed February 3, 2006 by stating the arguments were not persuasive because they were not commensurate with the scope of the claim, that there is no limitation in the claim that indicates "direction-specific protection resources". The attention of the examiner is respectfully directed to the end of claims 1 and 6 which recites "protection resources associated with a sending or receiving direction," or the two "unidirectional protection groups" recited in claim 2, or the recitation in claim 3 that all terminals or connection points in the unidirectional protection group at the receiving end are receivers, and all terminals or connection points in the

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unidirectional protection group at the sending end are senders, and so forth throughout the claims. It appears that the examiner ignored claim limitations in making the rejection originally, and again in dismissing applicants' arguments pointing out the claimed subject matter not taught in the cited art. It is respectfully requested that the examiner now consider the clear requirement of direction-specific resources in all of the claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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